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May 3, 2019

Via E-mail

Andrea Leshak, Esq.
Office of Regional Counsel
U.S. Environmental Protection Agency,
Region 2
290 Broadway, 17th Floor
New York, New York 10007-1866

Re: PROTECO Site in Puerto Rico

Dear Ms. Leshak:

This is the response made on behalf of Block Drug Company, Inc. ("BDC") to the United States Environmental Protection Agency's ("EPA's") March 28, 2019 Request for Information addressed to Jack Bailey with respect to the above-referenced site (the "RFI").

By way of introducing the parties, BDC, a New Jersey corporation, is a successor by merger to Reedco, Inc. ("Reedco") and is a wholly owned subsidiary of GlaxoSmithKline Consumer Healthcare Holdings LLC ("Healthcare"). Healthcare is an indirect subsidiary of GlaxoSmithKline plc ("PLC"), which is a publicly traded limited liability company organized under the laws of England. PLC acquired BDC in January 2001 through a wholly owned subsidiary. GlaxoSmithKline LLC ("GSK") is the United States operating company for the GlaxoSmithKline pharmaceutical businesses.

This response is based upon BDC and GSK's search for documents and information in their possession relating to Reedco, including the former Reedco facility located at or about State Road No. 3, Km. 76.4, Rio Abajo Ward, in Humacao, Puerto Rico (the "Facility"), which is the subject of the RFI, and to the PROTECO Site.

BDC notes that one of the enclosed documents, "Reedco & Dentco Environmental History" ("History"), while unverified by BDC, discusses the closure of the Facility in accordance with RCRA. Neither BDC nor GSK has any of the referenced documents in its possession, but those documents should be in the possession of EPA. Those documents likely contain information that would be relevant to the RFI.

BDC reserves its right to continue to review and to supplement, modify, and/or amend its responses should additional information become available.

BDC's Response to EPA's Request for Information

BDC objects to the instructions provided with the RFI, the definitions, and the requests to the extent any of those exceed the authority given to EPA in 42 U.S.C. § 9604.

Subject to these objections, BDC responds as follows:

1. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e). Without waiving such objection, GSK's mailing address is 5 Crescent Drive, Philadelphia, PA 19112. Healthcare's mailing address is 184 Liberty Corner Road, Suite 200, Warren, NJ 07059. BDC's mailing address is 184 Liberty Corner Road, Suite 200, Warren, NJ 07059. Reedco was a Delaware corporation. Reedco merged into BDC in or about 2008.
2. See response to Request No. 1.
3. See response to Request No. 1.
4. See response to Request No. 1.
5. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).
6. Based on the unverified information in the attached History, Tegrin Inc. (later known as Reedco) began operations at the Facility in or about March 1974. The Facility was sold in or about 2004 to F.I.G., Inc. pursuant to the attached November 11, 2004 Asset Purchase Agreement. BDC has undertaken a title search with respect to the Facility.
7. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).
8. Based on the unverified information in the attached History, Reedco initially manufactured Tegrin shampoo at the Facility. Reedco began manufacturing Kwell shampoo, which contained Lindane, in November 1974. Manufacturing of Kwell ended in 1992.
9. See response to Request No. 1.

10. See responses to Request Nos. 1 and 6.
11. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).
12. BDC has not identified any documents or information responsive to this request.
13. BDC has not identified any documents or information responsive to this request.
14. BDC has not identified any documents or information responsive to this request.
15. BDC has not identified any documents or information responsive to this request.
16. BDC has not identified any documents or information responsive to this request.
17. BDC has not identified any documents or information responsive to this request.
18. See response to Request No. 1.
19. BDC has not identified any documents or information responsive to this request.
20. BDC has not identified any documents or information responsive to this request.
21. BDC has not identified any documents or information responsive to this request.
22. Based on the unverified information in the attached History, Reedco used authorized waste contractors to remove all solid waste, liquid waste, and hazardous waste according to EPA and EQB regulations. The Facility treatment plant operated in accordance with Permit # GDA-91-607-062. All outflow from that plant discharged to the Humacao Regional Treatment Plant. Reedco additionally possessed an Air Emission Permit No. PLE-LC-36-0300-0363-I-II-0 with EPA and EQB.
23. BDC has not identified any documents or information responsive to this request.
24. BDC has not identified any documents or information responsive to this request.
25. BDC has not identified any documents or information responsive to this request.
26. BDC has not identified any documents or information responsive to this request.
27. BDC has not identified any documents or information responsive to this request.
28. See response to Request No. 1.

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29. BDC has not identified any documents or information responsive to this request.
30. BDC has not identified any documents or information responsive to this request other than those provided herewith.
31. BDC's and GSK's investigation is continuing. See Section 1.1 of the Asset Purchase Agreement. Neither BDC nor GSK otherwise has identified any documents or information responsive to this request.
32. BDC objects to this request as beyond the authority granted in CERCLA Section 104(e).
33. BDC has not identified any documents or information responsive to this request.
34. BDC has not identified any documents or information responsive to this request.
35. BDC has not identified any documents or information responsive to this request.
36. The undersigned counsel for BDC drafted this response. He has no personal knowledge of the responses. Searches for responsive documents were supervised by Andrew Boczkowski, Esq. (Assistant General Counsel), Justin Huang, Esq. (Senior Counsel), and Jan Landwehr (paralegal), each of GSK. None of these personnel has personal knowledge of the responses.

Very truly yours,



Glenn A. Harris

GAH/mds

cc: Zolymar Luna